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*Attorneys for Defendant Synchrony Bank*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

WILFRED MAYLAD, an individual,

Plaintiff,

V.

SYNCHRONY BANK, a foreign corporation; EQUIFAX INFORMATION SERVICES, LLC, a foreign limited-liability company, EXPERIAN INFORMATION SOLUTIONS, INC., a foreign corporation; TRANS UNION LLC, a foreign limited-liability company,

## Defendants.

Case No. 2:24-cv-01887-EJY

**JOINT UNOPPOSED MOTION TO  
EXTEND DEADLINE FOR  
DEFENDANT SYNCHRONY BANK  
TO RESPOND TO COMPLAINT**

Defendant Synchrony Bank (“Synchrony”) and Plaintiff Wilfred Maylad (“Plaintiff”), by counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1, respectfully request that this Court extend the deadline in which Synchrony has to answer or otherwise respond to Plaintiff’s Complaint, through and until December 11, 2024. In support of this Motion, the parties stipulate as follows:

1. This is the first request for extension of time for Synchrony to respond to Plaintiff's Complaint.

2. On October 9, 2024, Plaintiff filed a Complaint with this Court [ECF No. 1].

3. Synchrony was served with the Complaint on October 15, 2024 [ECF No. 9].

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1       4. Counsel for the parties have been engaged in settlement discussions and previously  
 2 agreed to extend Synchrony's deadline to respond to the Complaint to December 4, 2024.

3       5. In order to continue engaging in settlement discussions in good faith to resolve this  
 4 matter, counsel for Synchrony desires a seven (7) day extension until December 11, 2024, to file a  
 5 response to the Complaint.

6       6. Counsel for Synchrony conferred with Plaintiff's counsel regarding this requested  
 7 extension, and Plaintiff's counsel agrees to this extension.

8       7. The foregoing Motion is filed in good faith and not for dilatory or other improper  
 9 purpose.

10      8. Plaintiff would not suffer any prejudice by the Court permitting Synchrony the  
 11 requested extension of time and has consented to the requested extension.

12      9. Granting this Motion is in the interests of justice and is otherwise the right and  
 13 proper thing to do.

14           DATED this 4th day of December 2024.

15      **LEWIS ROCA ROTHGERBER  
CHRISTIE LLP**

16      */s/ Brittni A. Tanenbaum*

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21      *Counsel for Defendant Synchrony Bank*

15      **LAW OFFICE OF KEVIN L. HERNANDEZ**

16      */s/ Kevin L. Hernandez*

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22      *Counsel for Plaintiff Wilfred Maylad*

23           **ORDER**

24           **IT IS SO ORDERED.**

25        
 26      UNITED STATES MAGISTRATE JUDGE

27      DATED: December 5, 2024